

EXHIBIT Y

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SONIA FELDMAN

UNITED STATES DISTRICT

DISTRICT OF NEVADA

SONIA FELDMAN,

Plaintiff,

v.

MARK ANTHONY SAWYER, ET AL,

Defendants.

Case Number: 2:24-cv-00526-JCM-MDC

**PLAINTIFF SONIA FELDMAN'S
FIRST SET OF REQUESTS FOR
ADMISSIONS SERVED ON DEFENDANT
JENNIFER SAWYER**

PROPOUNDING PARTY: Plaintiff Sonia Feldman

RESPONDING PARTY: Defendant Jennifer Sawyer

RFA Set No: One

**PLAINTIFF'S 1ST SET OF REQUESTS FOR ADMISSIONS SERVED ON
DEFENDANT JENNIFER SAWYER**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff Sonia Feldman, by and through her attorneys, hereby serves her 1st Set of Requests for Admissions to Defendant Mark Anthony Sawyer.

INSTRUCTIONS

If, in responding to this First Set of Requests for Admissions ("Requests"), Responding Party encounters any ambiguities when construing a Request, Responding Party shall respond to the best of his, her or its ability and such response shall set forth the matter deemed ambiguous, and the construction used in responding.

DEFINITIONS

1. "Person(s)" refers to and includes, without limitation and in the singular as well as the plural, natural persons, attorneys in fact, powers of attorney, partnerships, corporations, limited liability companies, firms, joint ventures, groups, businesses and other associations, law firms, estates, trusts, and all other organizations and entities, unless the context specifically indicates otherwise.

2. The terms "related to" and "referring to" or "associated with" means, in whole or in part, constituting, evidencing, concerning, regarding, containing, embodying, reflecting, describing, involving, identifying, stating, referring to, dealing with, or in any way pertaining to.

3. The term "communications" shall include, without limitation, all letters, emails, handwritten or typewritten notes, notebooks, sound and/or voice recordings, voicemails, text messages, instant messages on any messaging platform, transcripts of sound recordings, tapes or other sound/voice recordings, contracts, agreements, reports, computer records, audio and videotapes, messages, summaries, and/or any other documentation, however produced or reproduced, whether sent, received or neither, including the original, draft, copies, and non-identical copies and the transmittal of such information in any form whatsoever.

4. The terms “and” or “or” have both conjunctive and disjunctive meanings.

5. The terms “any” and “all” mean “each” and “every.”

6. The terms “you” and “your” refers to Defendant Jennifer Sawyer.

REQUESTS FOR ADMISSIONS:

Request for Admission No. 1:

Admit that at the time you and your husband Mark Sawyer formed the MJS Nevada Trust you and your husband were insolvent?

Request for Admission No. 2:

Admit when you formed the MJS Nevada Trust, You and your husband owed more money than you and he combined had available to pay out to all those who had bridge loans with your husband if they all asked to withdraw their funds from the program.

Request for Admission No. 3:

Admit that you and your husband set up the MJS Nevada Trust while your husband was running a Ponzi scheme.

Request for Admission No. 4:

Admit that you and your husband set up the MJS Nevada Trust so you could both hide your assets from Plaintiff.

Request for Admission No. 5:

Admit that you and your husband set up the Nevada MJS Trust so you both could shield your assets from Plaintiff in case she sued for the money your husband agreed to pay her.

Request for Admission No. 6:

Admit that during the period from January 29, 2021, when Plaintiff wrote her first check to your husband, through at least the end of 2021, you were aware your husband was running a Ponzi scheme and you made no attempt to stop him.

Request for Admission No. 7:

Admit you were benefiting off Plaintiff's monies to fund your lifestyle.

Request for Admission No. 8:

Admit that at the time Plaintiff issued the check for \$1,166, 337.13 to your husband, you and he, as a couple, were insolvent.

Request for Admission No. 9:

Admit that at the time Plaintiff issued a check for \$1,166,337.13 to your husband, you and he were unable to pay all the debts that you jointly owed.

Request for Admission No. 10:

Admit that instead of using the Plaintiff's check for \$1,166,337.13 to make a bridge loan to others, your husband instead used that money to partially fund the Vegas Auto Gallery.

Request for Admission No. 11:

Admit that you assisted your husband in his Ponzi scheme.

Request for Admission No. 12:

Admit that you benefited from the \$1,176,337.13 Plaintiff invested with your husband.

Request for Admission No. 13:

Admit you were aware that when your husband told Ms. Feldman he would be able to more than double her money by using her money in his bridge loan program, it was a lie.

Request for Admission No. 14:

Admit that you knew when your husband promised to treat Plaintiff like his daughter, it was a lie.

Request for Admission No. 15:

Admit that you were aware at all relevant times of your husband's Ponzi scheme and that you did nothing to prevent it so you could continue to live your lavish lifestyle.

Request for Admission No. 16:

Admit that your husband lied when he promised to treat Plaintiff like his daughter in order to gain her trust.

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Request for Admission No. 17:

Admit that your husband lied when he promised to treat Plaintiff like his daughter in order to gain her trust so she would agree to invest over a million dollars into your husband's bridge loan program.

Request for Admission No. 18:

Admit that you shared with your husband, all the money Plaintiff entrusted to your husband.

Request for Admission No. 19:

Admit that you were a partner in your husband's Ponzi scheme.

Request for Admission No. 20:

Admit that you are a partner in your husband's Ponzi scheme.

Request for Admission No. 21:

Admit that you have been a partner in your husband's Ponzi scheme.

Request for Admission No. 22:

Admit that you used Plaintiff's money to fund your lavish lifestyle?

Request for Admission No. 23:

Admit that you formed the MJS Nevada Trust in order to prevent Plaintiff from recovering the money you and your husband cheated her out of?

DATED this 19th day of December, 2024.

**ALBRIGHT STODDARD, WARNICK &
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By: 

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of December, 2024, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on all parties currently on the electronic service list.

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9 By: /s/ Phyllis L. Cameron

10 Employee of Albright, Stoddard, Warnick & Albright
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